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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	:	Chapter 11
	:	
W.R. GRACE & CO., <u>et al</u>	:	Case No. 01-01139 (JKF)
	:	Jointly Administered
Debtors.	:	
	:	Claim No. 00009667

**RESPONSE TO DEBTORS' FOURTEENTH OMNIBUS
OBJECTION TO CLAIMS (NON-SUBSTANTIVE)**

On behalf of claimant, Donald Munsel (Claim No. 00009667), his attorney, Tom L. Lewis of Lewis, Slovak & Kovacich, P.C., responds to Debtors' Fourteenth Omnibus Objection to Claims (Non-Substantive) as follows:

1. Claimant's claim relates to asbestos contamination from a W.R. Grace product in or on the property, to wit: asbestos-contaminated vermiculite from the W.R. Grace mine near Libby, Montana.

2. Claimant's claim is based upon the findings of the U.S. Environmental Protection Agency in its Administrative Record and supplement, test results, and other documentation, as well as information obtained from other sources, including but not limited to local and national news reports, articles and meetings.


3. Claimant consented to the production and release of supporting documentation, in the possession of the U.S. Environmental Protection Agency, to W.R. Grace and W.R. Grace's representatives at the time of submission of claim in March, 2003.

4. Claimant provided such supporting documentation as was available from the U.S. Environmental Protection Agency's Libby office, to W.R. Grace and W.R. Grace's representatives as an attachment to his Response to Debtors' Second Omnibus Objection to Claims (Non-Substantive), filed on August 8, 2003.

5. Claimant has attached a more legible copy of the supporting documentation previously provided as well as additional supporting documentation, which was not available at the time the proof of claim was filed nor at the time of his response to the Debtors' Second Omnibus Objection to Claims (Non-Substantive).

Respectfully submitted this 6 day of October, 2005.

Lewis, Slovak & Kovacich, P.C.

By: 
Tom L. Lewis
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(Attorneys for Claimant)

CERTIFICATE OF SERVICE

I hereby certify that a true and legible copy of the foregoing Response to Debtors' Fourteenth Omnibus Objection to Claims (Non-Substantive) was served on the 6th day of October, 2005, by fax and by Federal Express courier, upon the following:

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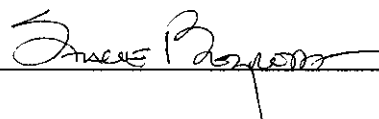
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Phillips, Goldman & Spence, P.A.
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Office of the United States Trustee:

Office of the United States Trustee
Attention: David Klauder
844 N. King Street
Wilmington, DE 19801
fax 302-573-6497



Property Sample Datasheet

Property: 340 Autumn Rd

Sample ID	Sample Group	Location Description (Sub Location)	Matrix	Sample Date	PLM		
					Method	LA (%)	
CS-14583-FG	Yard	Front yard	Surface soil	7/23/2003	PLM-VE	NO	
CS-14584-C	Yard	Back yard	Surface soil	7/23/2003	PLM-Grav	NO	
CS-14584-FG	Yard	Back yard	Surface soil	7/23/2003	PLM-VE	NO	

KEN
BD- 003155☐ Soil samples collected (Date: _____)

LIBBY ASBESTOS PROJECT
Contaminant Screening Study
Primary Structure and Property Assessment Information Field Form (IFF)

Field Logbook No.: 100149 Page No.: 102 Site Visit Date: 11/02/02
 Address: 340 370 Autumn Rd Structure Description: Trailer
 Occupant: Bex Munsel Phone Number: 293-5101, 293-938
 Owner (if different than occupant): Bex Munsel Phone Number: 293-9398
 Sampling Team: Paul Brown, Karen Barry (CDM)
 Field Form Check Completed by (100% of forms): Theresa Bony (CDM)
 Screening Field Check Completed by (2% of forms): _____

Data Item	Value	Notes
HOUSE ATTRIBUTES		
Property Description	<u>Residential</u> Industrial Commercial	
Surrounding Land Use	<u>Residential</u> Industrial Commercial School Mining Other: _____	
Year of Construction	<u>1900A 19783</u> Unknown	
Square Footage	<u>980</u> 2200 <u>11/04/02</u>	
Construction Material	<u>Wood frame</u> Masonry/Stone Other: <u>Aluminum</u>	
Number of Floors Above Ground	<u>1</u> 2 3 Other: _____	
Number of Rooms Per Floor Above Ground	1: <u>6</u> 2: _____ 3: _____ Other: _____	
Basement	Yes <u>No</u>	
Heating Source	<u>Wood/Coal</u> Electric Propane/Gas Other: _____	
Heat Distribution	Forced air <u>Radiant</u> Other: _____	

CSS INFORMATION FIELD FORM (continued)

Address: 390 Autumn RdBD# 003175

Data Item	Value	Notes
OCCUPANT INFORMATION		
Number of Adults/Employees	0 1 2 3 <u>(4)</u> 5-15 16-20 21-30 >30	2 in vac. trailer
Number of Children	0 <u>(1)</u> 2 3 4 Other: _____	1 child with flex house
Years at Location	<1 1-5 5-10 10-15 <u>>15</u>	
Was the residence/building remodeled?	Yes <u>(No)</u> If yes, When (years): <2 2-5 >5 Where: Attic Living Areas Garage Basement Other: _____	
Has resident/business purchased any Libby vermiculite materials from W.R. Grace in the past?	Yes <u>(No)</u>	
Has the property at this location been used for a for-profit enterprise of distributing, treating, storing, or disposing of Libby vermiculite?	Yes <u>(No)</u>	
Are there any known areas of exposed vermiculite?	Yes <u>(No)</u> If yes, Where: Ceiling Walls Floors Attic Other: _____	

CSS INFORMATION FIELD FORM (continued)

Address: 390 Autumn Rd.BD# 003155

Data Item	Value	Notes
INDOOR ASSESSMENT		
Vermiculite Insulation Past or Present	Attic: Yes <u>No</u> NA Unknown Walls: Yes <u>No</u> NA Unknown Basement: Yes No <u>NA</u> Unknown Crawl Space: Yes <u>No</u> NA Unknown Other: _____	Visual confirmation of current presence or absence required for attic.
Evidence of Physical Damage?	Yes <u>No</u>	
Evidence of Water Damage?	Yes <u>No</u>	
OUTDOOR ASSESSMENT		
Libby Amphibole Sources Present	Garden: <u>Yes</u> No NA <u>Unknown</u> Yard: <u>Yes</u> No NA <u>Unknown</u> Stockpiles: Yes <u>No</u> NA <u>Unknown</u> Other: <u>Flowerbed, 11/2/02</u>	Snow cover on yard's surface prevents inspection PS7-23-03
Proximity to Other Properties with Potential Sources of Libby Amphiboles	Next door <u>Greenhouse</u> Within same block Other: _____ <u>Unknown</u>	

CSS INFORMATION FIELD FORM (continued)

Address: 390 Autumn RdBD# 003155

Data Item	Value	Notes
EXPOSURE ASSESSMENT		
Type and Frequency of Activity Near Vermiculite Material - Indoor	Frequency: Once a day Once a week Once a month Once a year <u>Not Applicable</u>	Not Applicable applies when no vermiculite is present on the property.
	Duration of Contact: <1 hour 1-2 hours 2-4 hours >4 hours <u>Not Applicable</u>	
	Extent of Contact: Heavy Moderate Light <u>Not Applicable</u>	
Type and Frequency of Activity Near Vermiculite Material - Outdoor	Frequency: Once a day Once a week Once a month Once a year <u>Not Applicable</u>	Not Applicable applies when no vermiculite is present on the property.
	Duration of Contact: <1 hour 1-2 hours 2-4 hours >4 hours <u>Not Applicable</u>	
	Extent of Contact: Heavy Moderate Light <u>Not Applicable</u>	

CSS INFORMATION FIELD FORM (continued)

Address: 390 Arum RdBD# 003155

Data Item	Value	Notes
CONTAMINANT SCREENING STUDY ASSESSMENT		
Occupant Information		
Is there any knowledge of former miners, close relative of miners, or any highly exposed persons living or visiting the property?	Yes <input checked="" type="radio"/> No <input type="radio"/> Unknown	
Is the resident, past or present, diagnosed with an asbestos related disease?	Yes <input checked="" type="radio"/> No <input type="radio"/> Unknown	Don Munsel - diagnosed, all residents screened, Don lives in a separate trailer (BD # 003157)
Indoor Information		
Does the interior have Zonolite attic insulation?	Yes <input type="radio"/> No <input checked="" type="radio"/> Unknown	
Did the interior ever have Zonolite attic insulation?	Yes <input type="radio"/> No <input checked="" type="radio"/> Unknown NA	NA applies if attic currently has ZAI.
Are there vermiculite additives in any of the building materials?	Yes <input type="radio"/> No <input checked="" type="radio"/> Unknown	none observed
Outdoor Information		
Is there any evidence of primary source materials at or near the property?	Yes <input checked="" type="radio"/> No <input type="radio"/> Unknown DS 7-23-03	Subsided on yard's surface prevents inspection DS 7-23-03
Could this have been tracked indoors or otherwise spread outdoors on the property?	Yes <input checked="" type="radio"/> No <input type="radio"/> Unknown DS 7-23-03	
Overall Assessment		
Are primary source materials present at the property?	Yes <input checked="" type="radio"/> No <input type="radio"/> Unknown DS 7-23-03	
Where are primary source materials located?	Inside <input checked="" type="radio"/> Outside <input type="radio"/> Both <input type="radio"/> NA DS 7-23-03	
ADDITIONAL INFORMATION		
390 Arum Rd consists of 2 trailers, 246 Arum Rd is a vacant trailer between them. Rex Munsel lives in the trailer furthest to the north, Don Munsel lives in the trailer furthest to the south, 246 Arum is between those and vacant. 11/21/02		

CSS INFORMATION FIELD FORM (continued)

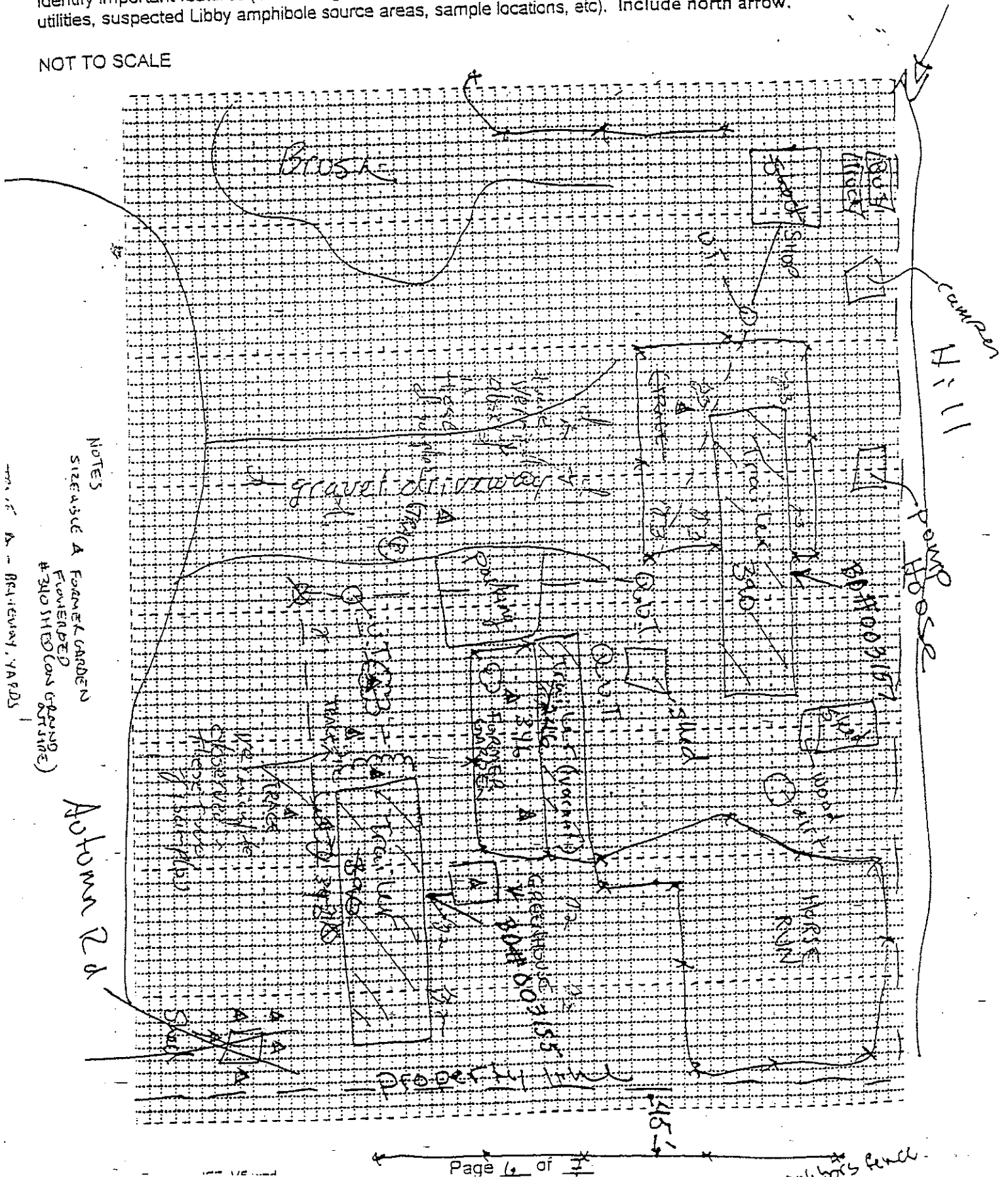
Address: 390 ~~246~~ Autumn Rd
 PB 11/02/02

SO# 003155
003156
 11/02/02

FIELD DIAGRAM OF PROPERTY

Identify important features (i.e. drainage, trees, gardens, structures, flowerbeds, utility poles, known underground utilities, suspected Libby amphibole source areas, sample locations, etc). Include north arrow.

NOT TO SCALE



BD- 003498

LIBBY ASBESTOS PROJECT
Contaminant Screening Study
Additional Information Field Form (AIFF)

Field Logbook No.: 100250 Page No.: 18 Site Visit Date: 7-23-03
 Address: 390 AUTUMN ROAD Structure Description: PUMP HOUSE
 Occupant: MR. + MRS. MUNSEL (DON) Phone Number: 293-5101
 Owner (if different than occupant): REX MUNSEL Phone Number: 293-9398
 Business Name: N/A
 Sampling Team: COFFEY / SPIELMAN
 Field Form Check Completed by (100% of forms): [Signature] 072303
 Screening Field Check Completed by (2% of forms): [Signature]

Instructions: Pull existing residential file folder and original IFF; ensure past dust sampling FSDS, and soil sampling FSDS, are present. Conduct additional investigations as described below. If action item does not apply to the property, check item does not apply to this property.

Category and Action Trigger	Action	Notes
INDOOR SAMPLING/ATTIC INSPECTION		
Current presence of VCI - Unknown Answer to IFF question: Does the interior have VCI? = Unknown	Current Status of VCI Determined: <input type="checkbox"/> Yes, update existing IFF. If VCI is present, collect dust samples in living space per dust sampling protocol after reviewing existing dust sample locations. <input type="checkbox"/> No, collect dust samples in living space per dust sampling protocol after reviewing existing dust sample locations. <input checked="" type="checkbox"/> Item does not apply to this property.	DS 7.23.03
Past presence of VCI - Yes Answer to IFF question: Did the interior ever have VCI? = Yes	Remnants of Vermiculite Visible: <input type="checkbox"/> Yes, collect dust samples in living space per dust sampling protocol after reviewing existing dust sample locations. <input type="checkbox"/> No, collect dust samples in living space and attic per dust sampling protocol after reviewing existing dust sample locations. <input type="checkbox"/> Unknown, attic cannot be accessed for visual inspection. Collect dust samples in living space per dust sampling protocol after reviewing existing dust sample locations. <input checked="" type="checkbox"/> Item does not apply to this property.	DS 7.23.03

 DO
 72303

CSS Additional IFF (Continued)

Address: 390 AUTUMN ROADBD# 003498

Category and Action Trigger	Action	Notes
Secondary Source Indications Answer to any IFF Secondary Source Indication questions (mining history, asbestos-related disease) = Yes	<input checked="" type="checkbox"/> Collect dust samples in living space per dust sampling protocol after reviewing existing dust sample locations. <input type="checkbox"/> Item does not apply to this property.	No ADDITIONAL INFO. IN PIFF
Vermiculite Present in Building Materials Answer to IFF question: Are there vermiculite additives in any of the building materials? = Yes	Condition of Vermiculite Containing Building Material: <input type="checkbox"/> Intact. No further action on this item required. <input type="checkbox"/> Friable, collect dust samples in living space per dust sampling protocol after reviewing existing dust sample locations. <input checked="" type="checkbox"/> Item does not apply to this property.	DS 7-23-03
Location dust samples NOT collected due to current presence of visible vermiculite (circle all that apply)	Basement Ground Floor Second Floor Attached Garage <u>None</u> Other: _____ <input type="checkbox"/> Item does not apply to this property.	Specific location of visible vermiculite: DS 7-23-03
OUTDOOR SAMPLING		
Visible vermiculite in large use area (Driveway or yard)	<input type="checkbox"/> Collect soil sample for each use area and add locations to existing property diagram. <input checked="" type="checkbox"/> Collect dust samples in living space per dust sampling protocol after reviewing existing dust sample locations. <input type="checkbox"/> Item does not apply to this property.	VISIBLE VERMICULITE IN YARD, DRIVEWAY
ADDITIONAL INFORMATION (Note any partial access or sample collection issues): <div style="border: 1px solid black; height: 150px; width: 100%; position: relative;"> 7-23-03 </div>		

BD- 003497

LIBBY ASBESTOS PROJECT
Contaminant Screening Study
Additional Information Field Form (AIFF)

Field Logbook No.: 100250 Page No.: 18 Site Visit Date: 7-23-03
 Address: 390 AUTUMN ROAD Structure Description: SHED
 Occupant: MR. + MRS. MUNSEL (Don) Phone Number: 293-DS 7-23-03 293-5101
 Owner (if different than occupant): REX MUNSEL Phone Number: 293-9398
 Business Name: N/A
 Sampling Team: CORREY / SPIELMAN
 Field Form Check Completed by (100% of forms): [Signature] 072503
 Screening Field Check Completed by (2% of forms): [Signature]

Instructions: Pull existing residential file folder and original IFF; ensure past dust sampling FSDS, and soil sampling FSDS, are present. Conduct additional investigations as described below. If action item does not apply to the property, check item does not apply to this property.

Category and Action Trigger	Action	Notes
INDOOR SAMPLING/ATTIC INSPECTION		
Current presence of VCI - Unknown Answer to IFF question: Does the interior have VCI? = Unknown	Current Status of VCI Determined: <input type="checkbox"/> Yes, update existing IFF. If VCI is present, collect dust samples in living space per dust sampling protocol after reviewing existing dust sample locations. <input type="checkbox"/> No, collect dust samples in living space per dust sampling protocol after reviewing existing dust sample locations. <input checked="" type="checkbox"/> Item does not apply to this property.	DS 7-23-03
Past presence of VCI - Yes Answer to IFF question: Did the interior ever have VCI? = Yes	Remnants of Vermiculite Visible: <input type="checkbox"/> Yes, collect dust samples in living space per dust sampling protocol after reviewing existing dust sample locations. <input type="checkbox"/> No, collect dust samples in living space and attic per dust sampling protocol after reviewing existing dust sample locations. <input type="checkbox"/> Unknown, attic cannot be accessed for visual inspection. Collect dust samples in living space per dust sampling protocol after reviewing existing dust sample locations. <input checked="" type="checkbox"/> Item does not apply to this property.	DS 7-23-03

DW
7-23-03